

JAN 09 2023

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

By: *Kevin P. Wanner, Clerk*  
*Deputy Clerk*

UNITED STATES OF AMERICA

v.

KRISTOPHER KNEUBUHLER

Criminal Action No.  
1:23-MJ-027-CMS

**Government's Motion for Detention**

The United States of America, by counsel, Ryan K. Buchanan, United States Attorney, and Theodore S. Hertzberg, Assistant United States Attorney for the Northern District of Georgia, moves for detention under 18 U.S.C. §§ 3142(e) and (f).

**1. Eligibility of Case**

This case is eligible for a detention order because this case involves a crime of violence.

**2. Reason for Detention**

The Court should detain defendant because there are no conditions of release that will reasonably assure the appearance of the person as required and the safety of any other person and the community.

**3. Rebuttable Presumption**

The United States will invoke the rebuttable presumption that no condition or combination of conditions will reasonably assure the appearance of the defendant as required and the safety of the community pursuant to 18 U.S.C. § 3142(e)(3). The presumption applies because there is probable cause to believe that the

defendant committed an offense involving a minor victim under 18 U.S.C. § 2252(a)(2).

**4. Time for Detention Hearing**

The United States requests the Court conduct the detention hearing after a continuance of three (3) days.

The United States requests leave of Court to supplement this motion with additional grounds or presumptions for detention.

Dated: January 9, 2023.

Respectfully submitted,

Richard Russell Federal Building  
75 Ted Turner Drive S.W., Suite 600  
Atlanta, Georgia 30303-3309  
Phone: (404) 581-6000  
Fax: (404) 581-6181

RYAN K. BUCHANAN  
United States Attorney

  
THEODORE S. HERTZBERG  
Assistant United States Attorney  
Ga. Bar No. 718163

**Certificate of Service**

The United States Attorney's Office served this document today by handing a copy to defense counsel.

January 9, 2023

/s/ THEODORE S. HERTZBERG

THEODORE S. HERTZBERG

*Assistant United States Attorney*